

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: JUUL LABS, INC.,  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

Case Nos. 3:19-md-2913-WHO;  
3:19-cv-08177-WHO

## **NOTICE OF VIDEOTAPED DEPOSITION**

Hon. William H. Orrick

**PLEASE TAKE NOTICE** that the undersigned attorney will take the videotaped deposition of:

**Name:** Christopher Pepper

**Date and Time:** March 9, 2023, at 9:00 a.m. PST

**Location:** Lieff Cabraser Heimann & Bernstein, LLP, 275 Battery Street, Suite 2900, San Francisco, CA 94111

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 30  
and *In Re: Juul Labs, Inc., Marketing, Sales Practices, And Products Liability Litigation*,  
Case No. 19-md-02913-WHO, Case Management Order Number 11 (CMO No. 11),  
Defendants Altria Group, Inc., Philip Morris USA Inc., Altria Client Services LLC,  
Altria Group Distribution Company, and Altria Enterprises LLC (“Altria”), by and  
through the undersigned counsel, intend to depose Christopher Pepper at the place and  
time set forth above.

1           The videotaped deposition will take place in person at Lieff Cabraser Heimann &  
 2 Bernstein, LLP, 275 Battery Street, Suite 2900, San Francisco, CA 94111. The  
 3 deposition will be coordinated by TSG Reporting, with a business address of 1300 I  
 4 Street NW, Suite 400E, Washington, District of Columbia, 20005. This deposition is  
 5 being taken for the purpose of discovery, for use at trial, or such other purposes as are  
 6 permitted under the Rules. The deposition will be recorded by stenographic means and  
 7 by audio and video.

10           All who intend to appear in person must adhere to the following COVID-19  
 11 policies. Live participants (including the witness, attorneys, staff, court  
 12 reporters/videographers, and anyone else who intends to observe or participate live at  
 13 the deposition) must show proof that they are vaccinated and boosted (if booster eligible)  
 14 unless they have a legal justification that can be reasonably accommodated.  
 15

17  
 18 Date: March 1, 2023  
 19

/s/ Beth A. Wilkinson

20           Beth A. Wilkinson (*pro hac vice*)  
 21 Brian L. Stekloff (*pro hac vice*)  
 22 James M. Rosenthal (*pro hac vice*)  
 23 Matthew R. Skanchy (*pro hac vice*)  
 24 Alysha Bohanon (*pro hac vice*)  
**25 WILKINSON STEKLOFF LLP**  
 26 2001 M Street NW, 10th Floor  
 27 Washington, DC 20036  
 28 Telephone: (202) 847-4000  
 bwilkinson@wilkinsonstekloff.com  
 bstekloff@wilkinsonstekloff.com  
 jrosenthal@wilkinsonstekloff.com  
 mskanchy@wilkinsonstekloff.com

1 abohanon@wilkinsonstekloff.com  
2 Moira K. Penza (pro hac vice)  
3 **WILKINSON STEKLOFF LLP**  
4 130 West 42nd Street, 24th Floor  
5 New York, NY 10036  
6 Telephone: 212-294-8910  
7 mpenza@wilkinsonstekloff.com  
8

9 /s/ John C. Massaro  
10

11 John C. Massaro (*pro hac vice*)  
12 Daphne O'Connor (*pro hac vice*)  
13 Jason A. Ross (*pro hac vice*)  
14 David E. Kouba (*pro hac vice*)  
15 **ARNOLD & PORTER KAYE SCHOLER**  
16 **LLP**  
17 601 Massachusetts Ave., N.W.  
18 Washington D.C. 20001  
19 Telephone: (202) 942-5000  
20 Facsimile: (202) 942-5999  
21 John.Massaro@arnoldporter.com  
22 Daphne.OConnor@arnoldporter.com  
23 Jason.Ross@arnoldporter.com  
24 David.Kouba@arnoldporter.com  
25

26 *Attorneys for Defendants Altria Group, Inc.,*  
27 *Philip Morris USA Inc., Altria Client Services*  
28 *LLC, Altria Group Distribution Company, and*  
29 *Altria Enterprises LLC*

1                   CERTIFICATE OF SERVICE

2                   I hereby certify that on March 1, 2023, a true and correct copy of the foregoing  
3 Notice of Taking Videotaped Oral Deposition was served via electronic mail upon the  
4 following:

5                   Thomas P. Cartmell  
6                   **WAGSTAFF & CARTMELL**  
7                   4740 Grand Ave., Suite 300  
8                   Kansas City, MO 64112  
9                   Telephone: (816) 701-1100  
10                  tcartmell@wcllp.com

11                  *Counsel for Plaintiff*

12                  Sarah R. London  
13                  **LIEFF CABRASER HEIMANN & BERNSTEIN**  
14                  275 Battery Street, Fl. 29  
15                  San Francisco, CA 94111  
16                  Telephone: (415) 956-1000  
17                  slondon@lchb.com

18                  Dena C. Sharp  
19                  **GIRARD SHARP LLP**  
20                  601 California St., Suite 1400  
21                  San Francisco, CA 94108  
22                  Telephone: (415) 981-4800  
23                  dsharp@girardsharp.com

24                  Dean Kawamoto  
25                  **KELLER ROHRBACK L.L.P.**  
26                  1201 Third Ave., Ste. 3200  
27                  Seattle, WA 98101  
28                  Telephone: (206) 623-1900  
dkawamoto@kellerrohrback.com

Ellen Relkin

1 **WEITZ & LUXENBERG**  
2 700 Broadway  
3 New York, NY 10003  
4 Telephone: (212) 558-5500  
erelkin@weitzlux.com

5 *Co-Lead Counsel for Plaintiffs*

6  
7  
8 Date: March 1, 2023  
9

10 /s/ Beth A. Wilkinson

11 Beth A. Wilkinson (*pro hac vice*)  
12 Brian L. Stekloff (*pro hac vice*)  
13 James M. Rosenthal (*pro hac vice*)  
14 Matthew R. Skanchy (*pro hac vice*)  
15 Alysha Bohanon (*pro hac vice*)  
16 **WILKINSON STEKLOFF LLP**  
17 2001 M Street NW, 10th Floor  
Washington, DC 20036  
Telephone: (202) 847-4000  
bwilkinson@wilkinsonstekloff.com  
bstekloff@wilkinsonstekloff.com  
jrosenthal@wilkinsonstekloff.com  
mskanchy@wilkinsonstekloff.com  
abohanon@wilkinsonstekloff.com

18 Moira K. Penza (*pro hac vice*)  
19 **WILKINSON STEKLOFF LLP**  
20 130 West 42nd Street, 24th Floor  
New York, NY 10036  
Telephone: 212-294-8910  
mpenza@wilkinsonstekloff.com

22 /s/ John C. Massaro

23 John C. Massaro (*pro hac vice*)  
24 Daphne O'Connor (*pro hac vice*)  
25 Jason A. Ross (*pro hac vice*)  
26 David E. Kouba (*pro hac vice*)  
27 **ARNOLD & PORTER KAYE SCHOLER**  
LLP  
601 Massachusetts Ave., N.W.  
Washington D.C. 20001

1 Telephone: (202) 942-5000  
2 Facsimile: (202) 942-5999  
3 John.Massaro@arnoldporter.com  
4 Daphne.OConnor@arnoldporter.com  
5 Jason.Ross@arnoldporter.com  
6 David.Kouba@arnoldporter.com  
7

8  
9  
10  
11 *Attorneys for Defendants Altria Group, Inc.,*  
12 *Philip Morris USA Inc., Altria Client Services*  
13 *LLC, Altria Group Distribution Company, and*  
14 *Altria Enterprises LLC*  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28